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August 31, 2020

VIA ECF

Hon. Judge Ann M. Donnelly, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. 4G
Brooklyn, New York 11201

Re: *Pozniak v. Shvartsman*
Docket No.: 1:20-cv-02956-AMD-RML

Dear Honorable Judge Donnelly:

As the Court is aware, this law firm represents respondent, Vladimir Shvartsman in the above referenced matter. Enclosed please find a copy of the Table of Cases which was inadvertently omitted from Respondent's Memorandum of Law in Opposition to Petition for Return of Child of August 28, 2020 (ECF 20).

We also enclose two additional Declarations in Opposition to the Petition which we received from witnesses in Israel immediately after the Sabbath (and which otherwise would have been filed on Friday evening) and we respectfully request that the Court deem them timely filed *nunc pro tunc*.

As always, we thank the Court for its continuing courtesy and consideration in this matter.

Respectfully submitted,

/s Marcus Aurelius Nussbaum
Marcus A. Nussbaum (MN 9581)

cc: **Via ECF**
All Counsel of Record